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14 Attorneys for
Peter Rydell, et al.

15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 **In re:**

19 **PG&E CORPORATION,**

20 **&**

21 **PACIFIC GAS AND ELECTRIC
COMPANY,**

22 **Debtors.**

23 **Affects:**

- PG&E Corporation**
- Pacific Gas & Electric Company**
- Both Debtors**

24 *All papers shall be filed in the Lead Case,
25 **No. 19-30088 (DM).**

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)

**DECLARATION OF AMANDA L. RIDDLE
IN SUPPORT OF MOTION FOR ORDER
AUTHORIZING WITHDRAWAL OF
COUNSEL**

1 I, Amanda L. Riddle, declare as follows:

2 1. I am an attorney duly admitted to practice before all courts of the State of
3 California, including the Northern District.

4 2. I am an attorney with Corey, Luzaich, de Ghetaldi & Riddle LLP (“Firm”),
5 attorney of record for Bankruptcy claimants, Peter Rydell, P.R., a minor child, and Peter Rydell
6 DBA Lens Apiaries.

7 3. I am informed and believe that facts set forth in this Declaration are true of my
8 personal knowledge, and if called upon to do so I could and would competently testify to these
9 facts.

10 4. On or around January 29, 2019, PG&E Corporation and Pacific Gas and
11 Electric Company (“Debtors”) filed voluntary petitions for bankruptcy under Chapter 11 of
12 Title 11 of the United States Code, initiating bankruptcy case number 19-30088 in the
13 Bankruptcy Court for the Northern District of California (“Bankruptcy Case”).

14 5. On May 17, 2019, Peter Rydell signed a retainer agreement (“Agreement”) on
15 behalf of himself and P.R., a minor child, and on September 23, 2019, Peter Rydell signed an
16 Agreement on behalf of Lens Apiaries with the Firm, engaging the Firm for legal
17 representation in connection with their legal action against PG&E Corporation and Pacific Gas
18 and Electric Company for damages caused by the Camp Fire.

19 6. On October 15, 2019, the Firm filed Claim No. 61207 on behalf of Peter Rydell,
20 Claim No. 70187 on behalf of P.R., a minor child, and Claim No. 61080 on behalf of Peter
21 Rydell DBA Lens Apiaries.

22 7. On December 20, 2019, the Firm filed Amended Claim No. 91580 on behalf of
23 Peter Rydell DBA Lens Apiaries.

24 8. On October 20, 2021, I communicated with Peter Rydell. As a result of that
25 conversation, it was clear to me that the attorney-client relationship had indeed broken down
26 irreconcilably and that, furthermore, ethical consideration required the Firm’s withdrawal.

27 9. On October 27, 2021, I sent to Peter Rydell the Fire Victim Trust Updated
28 Attorney Representation forms. To date, Mr. Rydell has not returned the completed forms.

10. On November 2, 2021, I further communicated with Mr. Rydell and those communications confirmed my belief that withdrawal was necessary.

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4 I declare under penalty of perjury that the foregoing is true and correct. Executed on
5 December 28, 2021, at Millbrae, CA.

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[Signature]

Amanda L. Riddle